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SY23 3AH

Date: 14/04/2026

Reference: 26/0177

Your ref: CAS-302729-W3D7

Dear Eleanor Sullivan,

PROPOSAL: Construction of earthed banked slurry lagoon (50.0m x 30.0m, 4.5m total depth) to provide 3,500m³ storage for cattle slurry.

LOCATION: Henton Farm, Henton Farm Road, Goldcliff, Newport, NP18 2AT.

Thank you for your letter dated 9th April 2026 regarding the above planning application. We appreciate Natural Resources Wales' comments and have set out below a response to the matters raised. Where appropriate, further technical detail is provided in the accompanying appendices.

Protected Sites and Pollution Prevention

It is proposed to install an impermeable slurry transfer pipe (approx. 75mm OD) in a narrow trench (approx. 300mm wide) excavated thorough the ditch. Prior to excavation, temporary coffer dams will be installed upstream and downstream of the excavation to isolate the works area and prevent sediment entering the drainage system during construction. The work will be undertaken during periods when ditch water levels are at their lowest practicable level.

The turf layer to the ditch banks and bed will be carefully stripped and stored, and fully reinstated upon completion of the works to restore the original profile and vegetation cover.

The pipe will be laid within protective ducting (sleeving) and buried at least 750mm below the bed of the ditch to prevent damage from dredging or machinery. The trench will be backfilled using the excavated impermeable clay, ensuring the material is free of stones and debris, and compacted in layers of 150mm to 300mm to prevent damage to the pipe.

The facility will be regularly inspected and maintained, and the pipe will be fitted with an isolation valve to allow the pipe to be shutoff in the unlikely event of failure.

Compliance with the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021

The proposed slurry store and associated infrastructure have been designed and located to meet the requirements of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (CoAPR). Calculations to support the volume of slurry produced, and to be stored, are included in the CEMP document

submitted as part of the planning application and are included in Appendix 1 of this letter. The calculations demonstrate that the proposed lagoon provides capacity beyond the statutory minimum required under the current regulations.

In addition to this, a new slatted reception pit with a minimum capacity of 30 m³ will be constructed as part of the works to roof a portion of the slurry yards at Henton Farm.

Typical livestock numbers on the holding include 120 in-milk dairy cows, which are kept on a slurry system at Henton Farm. Other livestock, kept on a slurry or straw based systems at other farmsteads include 20 dry cows, 40 in-calf heifers (12-24 months), 20 beef cattle (12-24 months) and 60 youngstock (0-12 months). The creation of the new slurry lagoon will in no way result in any increase to the numbers of livestock on the holding.

Buffer Zones

The development will maintain the minimum ditch buffer zones, in accordance with NRW guidance.

Flood Risk

The applicant acknowledges that the site lies within Flood Zone 3 (Sea) and Flood Zones 2 and 3 (Rivers), as well as within the TAN15 Defended Zone. The new lagoon will be designed to be structurally resilient to flooding, with finished levels and construction appropriate to the flood risk location. The lagoon will be constructed of compacted clay to maintain integrity during prolonged saturation and will include conservative side slope gradients, to reduce risk of slumping or erosion.

We consider that, with the additional information provided and the mitigation measures proposed, the development will not result in adverse impacts on the Gwent Levels SSSI, water quality, or flood risk. The proposal will deliver improved slurry management in accordance with current regulations and best practice.

We trust this addresses the concerns raised and would be pleased to provide any additional clarification if required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stuart Jones'.

Stuart Jones

Senior Agricultural Consultant

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APPENDIX 1

Table 1: Slurry Production from Livestock

Livestock Type	Number	Excreta per head per month	% collected as slurry	Slurry production 6.5 months
Dairy Cow 6000 – 9000 litre milk yield	120	1.92 m ³	100%	1,498 m ³
Total livestock slurry production				1,498 m³

Table 2: Additional volume to be stored

Description	Area/Number	Volume 6.5 months
Parlour Washings (0.9m ³ /head/month)	120 cows in-milk	702 m ³
Rainfall on slurry yards	456 m ²	301 m ³
Total		1,003 m³

Table 3: Existing slurry storage

Description	Capacity
Existing earth banked lagoon (to be infilled)	836 m ³
Total existing slurry storage (to be retained)	0 m³

Table 4: Assessment of slurry storage shortfall

	Slurry production 6.5 months
Livestock Slurry	1,498 m ³
Additional volume stored	1,003 m ³
Total Production	2,501 m³
Existing slurry storage capacity	0 m ³
Shortfall	2,501 m³

A slurry lagoon with a capacity of 3,500m³ will require an excavation of 50m by 30m with a total depth of 4.5m. The lagoon capacity takes into account the 750mm freeboard requirement and 6.5 months rainfall on the store. The five-month winter rainfall (Oct – Feb) according to DataMapWales is 507mm. To provide 6.5 months storage, rainfall over this period is assumed to be 659mm, requiring a total storage capacity of 989m³.

Table 5: Summary of lagoon storage capacity

	Capacity
Total proposed lagoon storage capacity	3,500 m ³
Rainfall on store (6.5 months)	989 m ³
Available storage capacity (6.5 months)	2,511 m³